

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

TIMOTHY TYLER, *et al.*,

Plaintiffs,

v.

CHESAPEAKE APPALACHIA,
L.L.C., CHESAPEAKE ENERGY
CORPORATION, and CHESAPEAKE
ENERGY MARKETING, L.L.C.,

Defendants.

CIVIL ACTION NO. 3:16-0456

JUDGE MEHALCHICK

ELECTRONICALLY FILED

JOINT STATUS REPORT

Pursuant to the Court's March 18, 2025 Order (ECF No. 90), Plaintiffs Timothy Tyler, Terri Tyler, Tim & Terri Family LLP, Tyler 5 Family LP, Rodney Mowry, and Dianna Mowry (collectively "Plaintiffs") and Chesapeake Appalachia, L.L.C., on behalf of the Chesapeake Defendants (collectively "Chesapeake"), submit this joint status report.

On July 27, 2023, Chesapeake filed a Motion (the "Motion") with the Bankruptcy Court seeking entry of an order (a) enforcing the Confirmation Order and Plan, and requiring the plaintiffs in the Pennsylvania Royalty Cases (including this matter) to dismiss their pre-Effective Date claims against the Reorganized Debtors; and (b) declaring that the MEC Settlement is null and void. Chesapeake Mot., *In re Chesapeake Exploration, L.L.C.*, Case No. 20-33239 (DRJ) (Bankr. S.D.

Tex. Jul. 27, 2023) (Bankruptcy Court Docket No. 322). On August 11, 2023, Chesapeake and the Plaintiffs submitted to the Bankruptcy Court a Stipulation and Agreed Order Regarding Claims Asserted by the Tyler Plaintiffs. *See In re Chesapeake Exploration, L.L.C.*, Case No. 20-33239 (DRJ) (Bankr. S.D. Tex. Aug. 11, 2023) (Bankruptcy Court Docket No. 330). That Stipulation and Agreed Order was adopted by the Bankruptcy Court on August 24, 2023. On September 6, 2023, the parties submitted to this Court a Joint Stipulation and Order to Dismiss Pre-Effective Date Claims with Prejudice. (ECF 73.)

On August 31, 2023, the Bankruptcy Court entered an Order (I) Enforcing the Confirmation Order and Plan; and (II) Declaring the MEC Settlement and the Non-MEC Settlement Null and Void. *See Order, In re Chesapeake Exploration, L.L.C.*, Case No. 20-33239 (DRJ) (Bankr. S.D. Tex. Jul. 27, 2023) (Docket No. 347) (herein referred to as the “Bankruptcy Court Order”). The MEC Class Plaintiffs filed a Notice of Appeal to the United States District Court for the Southern District of Texas on September 14, 2023. MEC Class Plaintiffs’ opening brief was filed on February 8, 2024, Chesapeake’s opposition brief was filed on March 11, 2024, and a Reply Brief by MEC Class Plaintiffs followed on March 25, 2024. Briefing in the matter is now closed and oral argument is scheduled for August 6, 2025.

Plaintiffs and Chesapeake respectfully request that the Court maintain the stay in this matter until the appeal before the United States District Court for the Southern District of Texas is resolved.

Dated: June 16, 2025

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on June 16, 2025, a copy of the foregoing was filed electronically. Notice of this filing will be sent to all parties who have appeared in this action via the Court's electronic filing system. Parties may access this filing through the Court's system.

/s/ John B. Dempsey
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